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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION 24-cr-00398 Judge Jorge L. Alonso Magistrate Judge Maria Valdez RANDOM/CAT 4

UNITED STATES OF AMERICA

Case No.:

v.

Violation: Title 18, United States

MICHAEL JAMES WHEELER

Code, Section 1956(h)

The ACTING UNITED STATES ATTORNEY charges:

Between on or about December 24, 2022, and on or about April 4, 2023, in the Northern District of Illinois, Eastern Division, and elsewhere,

## MICHAEL JAMES WHEELER,

defendant herein, did conspire with Individual A, and others known and unknown, to commit an offense in violation of Title 18, United State Code, Section 1956, namely, to knowingly conduct a financial transaction affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, namely, wire fraud, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting such financial transaction knew that property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

In violation of Title 18, United States Code, Section 1956(h).

Digitally signed by MICHELLE MICHELLE PETERSEN PETERSEN

Date: 2024.08.27 23:26:06 -05'00' for MP

ACTING UNITED STATES ATTORNEY